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March 4, 2025

By E-mail and ECF

The Honorable Natasha C. Merle
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Halima Salman, 24-CR-206 (NCM)

Dear Judge Merle,

I write to supplement our pending motion for a modification of Ms. Salman's conditions of release to, *inter alia*, attend two craft fairs run by her grandmother. ECF No. 53. Ms. Salman spends much of home incarceration creating crocheted items, a hobby shared by her family members. Her local JoAnn Fabrics store is closing, give the company's bankruptcy. *E.g.*, Jeanine Santucci and Phaedra Trethan, *USA Today*, "All Joann Stores Will Soon Close, Leaving Crafters Dejected and Frustrated," at <https://www.usatoday.com/story/news/nation/2025/03/02/joann-fabric-closures-impacts-american-crafters/80690707007/>. Ms. Salman would like to go to the JoAnn Fabrics store in Belmont, New Hampshire, on a date and time to be set by Pretrial Services, to shop for yarn before the store goes out of business. She would be accompanied by her mother and grandmother. This supplemental request is with the consent of her supervising Pretrial Services officer Jacquelyne Vollaro, and opposed by EDNY Pretrial and the government.

Thank you for your consideration.

Respectfully Submitted,

/s/

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cc: AUSAs Andrew Reich and Amanda Shami (by ECF and email)
US Probation Officer Jacquelyne Vollaro (by email)
EDNY Pretrial Services Officer Valeria Lopez (by email)